

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL RECEIVED

Before the
Federal Communications Commission
Washington, D.C. 20554

MAY 17 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
800 Data Base Access Tariffs and the) CC Docket No. 93-129
800 Service Management System Tariff)

U S WEST CLARIFICATION

This memorandum is intended to clarify a statement contained in U S WEST's further supplemental direct case with respect to its activities as a Responsible Organization ("RESP ORG"). In that filing, U S WEST said in passing that it "does not provide RESP ORG services in connection with interstate 800 services."¹ There is one set of circumstances, known as "complementary 800 service," in which U S WEST could, in certain instances, be understood by some as providing RESP ORG services for some interstate 800 services.

U S WEST provides intrastate 800 services only, and it acts as a RESP ORG only when it provides 800 service to a customer. U S WEST does not act as a RESP ORG when it does not provide intrastate 800 services to a customer.

U S WEST acts as a RESP ORG in one of two situations: (1) the customer orders intrastate 800 service only, and U S WEST is the 800 service provider; or (2) the customer orders intrastate and interstate 800 service using the same 800 number, and U S WEST provides the intraLATA portion of

¹See U S WEST Further Supplement to Direct Case and Response to Comments, CC Docket No. 93-129, at 24 (May 5, 1994).

No. of Copies rec'd
List ABCDE

024

the service while an interexchange carrier provides the interLATA (and interstate) portion of the service. The latter situation — involving two carriers providing a single service to a single customer — is known as complementary 800 service.

There can be only one RESP ORG for each 800 number, and some means must therefore be used to designate the RESP ORG in complementary service arrangements. U S WEST has entered into a Memorandum of Understanding with eight different interexchange carriers to provide complementary 800 services, and this document specifies that U S WEST and the interexchange carrier "shall honor the subscriber's decisions as to who shall be named the Responsible Organization ("RESP ORG") on the 800 record."²


Thus, pursuant to this contractually-agreed-to arrangement, sometimes U S WEST and sometimes the interexchange carrier is the RESP ORG for a customer using a complementary service arrangement. If the customer chooses U S WEST as the RESP ORG, U S WEST is the RESP ORG not only

²This document further provides that "[w]hichever company is designated RESP ORG shall update the other Party's routing requirements into the 800 record within the mutually agreed upon intervals. The designated RESP ORG also agrees to complete the mutually agreed upon 800 service forms and shall deliver to the other Party by way of a mutually agreed upon delivery method."

for its own intrastate 800 service but also for the interstate services provided by the complementary interexchange carrier.

Respectfully submitted

U S WEST Communications, Inc.

A handwritten signature in black ink, appearing to read "Jeffrey S. Bork", written over a horizontal line.

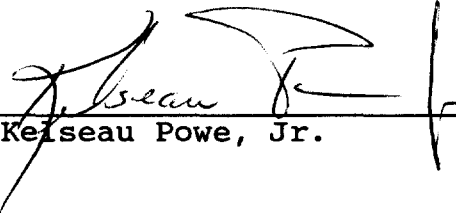
Jeffrey S. Bork
1020 19th Street, N.W., Suite 700
Washington, D.C. 20036
303-672-2700

Laurie Bennett, Of Counsel

May 17, 1994

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 17th day of May, 1994, I have caused a copy of the foregoing **U S WEST CLARIFICATION**, to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.


Kelseau Powe, Jr.

***Via Hand-Delivery**

(CC93-129/BM/lh)

*A. Richard Metzger, Jr.
Federal Communications Commission
Room 500
1919 M Street, N.W.
Washington, DC 20554

*Thomas Quaile
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Thomas G. David
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Mark Uretsky
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Gregory J. Vogt
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Peggy Reitzel
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

*Judith A. Nitsche
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Gary Phillips
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

*Steven Funkhouser
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*Tariff Division
Federal Communications Commission
Room 518
1919 M Street, N.W.
Washington, DC 20554

*International Transcription
Services
Suite 140
2100 M Street, N.W.
Washington, DC 20037

William A. Blase, Jr.
Southwestern Bell Corporation
Suite 1000
1667 K Street, N.W.
Washington, DC 20006

Robert C. Mackinchan, Jr.
Vincent L. Crivella
General Services Administration
Room 4002
18th & F Streets, N.W.
Washington, DC 20405

Gail L. Polivy
GTE Service Corporation
Suite 1200
1850 M Street, N.W.
Washington, DC 20036

Paul J. Berman
Ellen K. Snyder
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, DC 20044

ATU

Roy L. Morris
J. Scott Nicholls
Allnet Communication Services, Inc.
Suite 500
1990 M Street, N.W.
Washington, DC 20036

James P. Tuthill
Nancy C. Woolf
Pacific/Nevada Bell
Room 1523
140 New Montgomery Street
San Francisco, CA 94105

Jay C. Keithley
United Telephone Companies
Suite 1100
1850 M Street, N.W.
Washington, DC 20036

James L. Wurtz
Pacific/Nevada Bell
Suite 400
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004

Craig T. Smith
United Telephone Companies
P.O. Box 11315
Kansas City, MO 64112

Cindy Z. Schonhaut
Metropolitan Fiber Systems, Inc.
Suite 300
3000 K Street, N.W.
Washington, DC 20007

Carol R. Schultz
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, DC 20006

James B. Gainer
Ann Henkener
Public Utilities Commission
of Ohio
180 East Broad Street
Columbus, OH 43266

Henry D. Levine
Mary K. O'Connell
Levine, Lagapa & Block
Suite 602
1200 19th Street, N.W.
Washington, DC 20036

Joseph P. Markoski
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, DC 20044

NDC

Mitchell F. Brecher
Terri B. Natoli
Donelan, Cleary, Wood & Maser, P.C.
Suite 850
1275 K Street, N.W.
Washington, DC 20005-4078

Richard McKenna
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092

Mark C. Rosenblum
Robert J. McKee
Judy Sello
American Telephone and Telegraph
Company
Room 2255F2
295 North Maple Avenue
Basking Ridge, NJ 07920

Stuart A.C. Drake
Kirkland & Ellis
Suite 1200
655 15th Street, N.W.
Washington, DC 20005
(2 copies)

CBTC
SNET

Leon M. Kestenbaum
Norina T. Moy
Sprint Communications Company
Suite 1110
1850 M Street, N.W.
Washington, DC 20036

Genevieve Morelli
Competitive Telecommunications
Association
Suite 220
1140 Connecticut Avenue, N.W.
Washington, DC 20036

William J. Balcerski
NYNEX Telephone Companies
Room 427
120 Bloomingdale Road
White Plains, NY 10605

John J. Bartlett
Robert J. Butler
Kurt E. DeSoto
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, DC 20006

Jeffrey W. Reynolds
Sugar Land Telephone
14141 Southwest Freeway
Sugar Land, TX 77487

Catherine R. Sloan
LDDS Communications, Inc.
Suite 400
1825 Eye Street, N.W.
Washington, DC 20006

M. E. King, Jr.
Nevada Bell
P.O. Box 11010
Reno, NV 89520

Andrew D. Lipman
Richard M. Rindler
Swidler & Berlin, Chartered
Suite 300
3000 K Street, N.W.
Washington, DC 20007

Thomas E. Grace
Ameritech Services
Location 4H70
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

Eric Fishman
Sullivan & Worchester
1025 Connecticut Avenue, N.W.
Washington, DC 20036

Ronald W. Barkby
Centel Telephone Companies
8745 West Higgins Road
Chicago, IL 60631

Robert A. Mazer
Nixon, Hargrave, Devans & Doyle
Suite 800
One Thomas Circle, N.W.
Washington, DC 20005

LINCOLN

Bob F. McCoy
Joseph W. Miller
John C. Gammie
WilTel, Inc.
P.O. Box 2400
Tulsa, OK 74121

Richard A. Askoff
National Exchange Carrier
Association
100 South Jefferson Road
Whippany, NJ 07981

Michael L. Glaser
Hopper & Kanouff, P.C.
Suite 200
1610 Wynkoop
Denver, CO 80202

Emmanuel Staurulakis
Thomas J. Moorman
John Staurulakis, Inc.
6315 Seabrook Road
Seabrook, MD 20706

CENTURY

Dr. Lee L. Selwyn
Susan M. Gately
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108-2603

Chris Dugan
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, DC 20005-2088

Heather Burnett Gold
Association for Local Tele-
communications Services
Suite 1050
1150 Connecticut Avenue, N.W.
Washington, DC 20036

James S. Blaszak
Gardner, Carton & Douglas
Suite 900 - East Tower
1301 K Street, N.W.
Washington, DC 20005

AD HOC

Carolyn C. Hill
ALLTEL Service Corporation
Suite 220
655 15th Street, N.W.
Washington, DC 20005

Stephen G. Kraskin
Kraskin & Associates
Suite 810
2120 L Street, N.W.
Washington, DC 20037

CTO

Elkhart Telephone Company
P.O. Box 817
Elkhart, KS 67950-0817

Chillicothe Telephone Company
P.O. Box 480
Chillicothe, OH 45601-0647

Farmers Telephone Cooperative, Inc.
P.O. Box 217
Rainsville, AL 35986

William D. Baskett, III
Thomas E. Taylor
David S. Bence
Frost & Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

CBT

Fidelity Telephone Company
64 North Clark
Sullivan, MO 63080

Citizens Utilities Companies
High Ridge Park
Stamford, CT 06905

Great Plains Communications, Inc.
1626 Washington Street
Blair, NE 68008

Dunkirk and Fredonia Telephone
Company
P.O. Box 209
Fredonia, NY 14063

Hargray Telephone Company
P.O. Box 5519
Hilton Head Island, SC 29938

Illinois Consolidated Telephone
Company
121 South 17th Street
Mattoon, IL 61938

Northwestern Indiana Telephone
Company
P.O. Box 67
Hebron, IN 46341

La Fourche Telephone Company, Inc.
P.O. Box 188
La Rose, LA 70373

Pineland Telephone Cooperative
P.O. Box 678
Metter, GA 30439

Lufkin-Conroe Telephone Exchange
P.O. Box 909
Lufkin, TX 75901

Josephine S. Trubek
Rochester Telephone Corporation
180 South Clinton Avenue
Rochester, NY 14646-0700

Millington Telephone Company, Inc.
4880 Navy Road
Drawer 429
Millington, TN 38083

Roseville Telephone Company
P.O. Box 969
Roseville, CA 95661

Mount Horeb Telephone Company
P.O. Box 65
Mount Horeb, WI 53572

Taconic Telephone Corporation
Taconic Place
Chatham, NY 12037

Alan Y. Naftalin
Charles R. Naftalin
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, DC 20036

John M. Goodman
Bell Atlantic Telephone Companies
1710 H Street, N.W.
Washington, DC 20006

Union Telephone Company
P.O. Box 428
Plain Dealing, LA 71064

Helen Shockey
Shirley Ranson
BellSouth Telecommunications, Inc.
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Vista Telephone Company
14450 Burnhaven Drive
Burnsville, MN 55337

Robert M. Lynch
Richard C. Hartgrove
Paul Walters
Southwestern Bell Telephone
Company
Room 3330
One Bell Center
St. Louis, MO 63101

Vista-United Telecommunications
P.O. Box 10180
Lake Buena, FL 32830-0180

Eugene J. Baldrate
Southern New England Telephone
Company
227 Church Street
New Haven, CT 06510

Warwick Valley Telephone Company
Warwick Communications
5506 Detroit Avenue
Cleveland, OH 44102

A. W. Brothers
The Beehive Telephone Companies
P.O. Box 520
Wendover, UT 84083

William R. Tempest
DSC Communications Corporation
1000 Coit Road
Plano, TX 75075-5813

Stephen L. Goodman
Halprin, Temple & Goodman
Suite 1020-East Tower
1301 K Street, N.W.
Washington, DC 20005

NTI

Randolph J. May
Timothy J. Cooney
Sutherland, Asbill & Brennan
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004-2104
(2 copies)

CI
FFMC

Raymond L. Strassberger
Northern Telecom, Inc.
Suite 700
801 Pennsylvania Avenue, N.W.
Washington, DC 20004